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1 Exhibit B to the Farmby Declaration in the above-entitled case be  
2 kept under seal until further order of the Court.

3 This ex parte application is based upon the attached memorandum  
4 of points and authorities and Declaration of Daniel H. Weiner.

5

6 Dated: October 6, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI  
8 Acting United States Attorney

9 JOSEPH T. MCNALLY  
10 Assistant United States Attorney  
11 Acting Chief, Criminal Division

12 /s/  
13 IAN V. YANNIELLO  
14 GREGORY W. STAPLES  
15 DANIEL H. WEINER  
16 Assistant United States Attorneys  
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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Plaintiff United States of America requests that this Court seal  
3 the government's Motion to Empanel an Anonymous Jury, unredacted  
4 Declaration of Jarron Farmby, and Exhibit B to the Farmby Declaration  
5 in this case. The government has publicly filed redacted versions of  
6 its Motion to Empanel an Anonymous Jury and Declaration of Jarron  
7 Farmby to protect sensitive witness information and other sensitive  
8 information.

9 The Court has inherent supervisory authority to seal documents  
10 in appropriate circumstances. See Nixon v. Warner Communications,  
11 Inc., 435 U.S. 589, 598 (1978) ("Every court has supervisory power  
12 over its own records and files . . . .").

13 Here, for the reasons described in the attached declaration,  
14 sealing of these documents is necessary to protect certain criminal  
15 history records and the identity of witnesses who participated in the  
16 government's investigation, who may testify at trial, and/or whose  
17 safety or whose family's safety may be endangered by disclosure of  
18 identifying information.

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The government accordingly requests that the documents described in the attached declaration be maintained under seal until further order of the Court.

Dated: October 6, 2025

Respectfully submitted,

BILAL A. ESSAYLI  
Acting United States Attorney

JOSEPH T. McNALLY  
Assistant United States Attorney  
Acting Chief, Criminal Division

/s/  
IAN V. YANNIELLO  
GREGORY W. STAPLES  
DANIEL H. WEINER  
Assistant United States Attorneys

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

**DECLARATION OF DANIEL H. WEINER**

I, Daniel H. Weiner, declare as follows:

1. I am an Assistant United States Attorney for the Central District of California and I am one the attorneys assigned to the prosecution of United States v. Durk Banks, et al., No. CR 24-621(B)-MWF. I make this declaration in support of the government's unopposed ex parte application for an order sealing the government's unredacted Motion to Empanel an Anonymous Jury, unredacted Declaration of Jarron Farmby, and Exhibit B to the Farmby Declaration.

2. The government requests leave to file these documents under seal. The above-described documents discuss and/or contain certain sealed and/or expunged criminal history records, the criminal history records of non-charged individuals, and identifying information of witnesses who participated in the government's investigation, who may testify at trial, and/or whose safety or whose family's safety may be endangered by disclosure of identifying information. Sealing of these documents is therefore desirable to protect certain individual's privacy interests, and because the government believes that public disclosure of such information may endanger the witnesses and/or their family's safety, and could cause others to attempt to intimidate the witnesses and/or their family, or otherwise dissuade the witnesses from cooperating with the government.

3. Accordingly, the government requests that the government's unredacted Motion to Empanel an Anonymous Jury, unredacted Declaration of Jarron Farmby, and Exhibit B to the Farmby Declaration be kept under seal until further order of the Court.

4. Counsel for defendants advised the government during a telephonic meet and confer on October 1, 2025 that they had no objection to the government's request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on October 6, 2025, at Los Angeles, California.

/s/  
DANIEL H. WEINER